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3 **LJU LAW FIRM**

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Counsel for Plaintiff

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 MICHAEL RODRIGUEZ,

10 CASE NO.: 2:19-cv-02074-ART-MDC

11 Plaintiff,

12 **STIPULATION TO EXTEND TIME TO**
13 **SUBMIT DISCOVERY PLAN AND**
14 **SCHEUDLING ORDER [ECF NO. 142]**

15 vs.

16 WELLPATH, *et al.*,

17 Defendants.

18 Plaintiff, MICHAEL RUDOLPH RODRIGUEZ, by and through his attorney of record,
19 JAMES D. URRUTIA, ESQ. of LJU LAW FIRM, and Defendants, NaphCare, Inc.; Estate of Harry
20 Duran, M.D., Kendra Meyer, Lee Meisner, Earl Salviejo, and Larry Williamson, D.O., by and
21 through their attorney of record, MELANIE L. THOMAS ESQ., and Defendant Las Vegas
22 Metropolitan Police Department, Richard Forbus, and Fred Meyer, by and through their attorney
23 of record, KRISTOPHER J. KALKOWSKI, ESQ., hereby submit their stipulation and agreement
24 to extend the deadline to submit a discovery plan and scheduling order [ECF 142] and respectfully
25 request that the Court extend the submittal deadline for an additional period of one week (7) days,
26 making the Discovery Plan and Scheduling Order due on May 15, 2024. This request is supported
27 in good cause and excusable neglect.

28 . . .

On April 29, 2024, a meet and confer session took place. However, parties are of the opinion that a second meet and confer is warranted to effectively resolve the specifics of the discovery to be conducted.

Dated this 6th day of May, 2024.

Dated this 6th day of May, 2024.

LJU LAW FIRM

LEWIS BRISBOIS BISGAARD & SMITH, LLP

/s/ James D. Urrutia
JAMES D. URRUTIA, ESQ.
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Counsel for Plaintiff, MICHAEL RODRIGUEZ

/s/ Melanie L. Thomas
MELANIE L. THOMAS, ESQ.
(Bar No. 12576)
6385 S. Rainbow Blvd., Ste 600
Las Vegas, NV 89118
Counsel for Defendants

Dated this 6th day of May, 2024.

KAEMPFER CROWELL

/s/ Lyssa Anderson
LYSSA ANDERSON, ESQ.
Nevada Bar No. 5781
KRISTOPHER J. KALKOWSKI, ESQ.
Nevada Bar No. 14892
1980 Festival Plaza Drive, Suite 650
Las Vegas, NV 89135
Counsel for Defendants

IT IS SO ORDERED.

DATED: 5/6/24



UNITED STATES MAGISTRATE JUDGE